

PEPPER & CORAZZINI

L. L. P.

ATTORNEYS AT LAW

1776 K STREET, N.W., SUITE 200

WASHINGTON, D.C. 20006

(202) 296-0600

VINCENT A. PEPPER
ROBERT F. CORAZZINI
PETER GUTMANN
JOHN F. GARZIGLIA
ELLEN S. MANDELL
HOWARD J. BARR
MICHAEL J. LEHMKUHL *
SUZANNE C. SPINK *
MICHAEL H. SHACTER
PATRICIA M. CHUH
LEE G. PETRO *

* NOT ADMITTED IN D.C.

GREGG P. SKALL
E. THEODORE MALLYCK
OF COUNSEL

FREDERICK W. FORD
1908-1986

TELECOPIER (202) 296-5572

INTERNET PEPCOR@COMMLAW.COM

WEB SITE HTTP://WWW.COMMLAW.COM

July 2, 1998

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

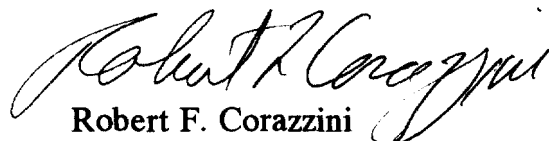
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Amendment of Parts 21 and 74 to Enable Multipoint
Distribution Service and Instructional Television Fixed
Service Licensees to Engage in Fixed Two-Way Transmissions -
MM Docket No. 97-217 and RM-9060: EX PARTE
COMMUNICATION**

Dear Ms. Salas:

Transmitted herewith on behalf of UT/TV-Houston, is an original and fifteen (15) copies of its additional comments in the above-referenced rule making proceeding invited by the Commission pursuant to its June 12, 1998 public notice (DA 98-1119). Eleven copies are provided herewith for distribution to each Commissioner and staff member identified on the comments as receiving a copy of this filing. Should there be any questions concerning this matter, please communicate directly with the undersigned.

Very truly yours,


Robert F. Corazzini

Enclosure

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UT TELEVISION
The University of Texas-Houston
Health Science Center
1100 Holcombe Blvd.
Suite 19.100
Houston, TX 75230

July 1, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

**Re: Amendment of Parts 21 and 74 to Enable Multipoint
Distribution Service and Instructional Television Fixed
Service Licensees to Engage in Fixed Two-Way Transmissions--
MM Docket No. 97-217 and RM-9060: EX PARTE
COMMUNICATION**

Dear Ms. Salas:

A public notice was issued by the Commission on June 12, 1998 (DA 98-1119) in the above-referenced proceeding offering any interested party the opportunity to respond to certain **ex parte** comments filed in the above-captioned proceeding. UT/TV Houston ("UT Television") accepts this opportunity to apprise the Commission of its support for expeditious adoption of new rules and policies consistent with the proposals advanced by the over 110 wireless cable operators, ITFS licensees, MDS licensees and equipment vendors that commenced this proceeding (the "Petitioners").

UT Television utilizes ITFS technology to transmit medical grand rounds and other educational programs from UT Medical School, UT M.D. Anderson Cancer Center and UT School of Nursing to hospitals in the greater Houston area for physicians, nurses and patients. Two-way technology is greatly needed to better serve

these distant sites - thus permitting live, interactive involvement by participants at all sites.

UT Television has previously participated in this rule making proceeding and has supported the Petitioners' proposals. The benefits of two-way technology must be fully available for use by educators without delay. Full availability requires that all ITFS licensees must be eligible to use their own channels for return path applications if they choose. Furthermore, the Petitioners' proposed interference protection rules and policies provide adequate protection of the ITFS interests. Adoption of the proposals are therefore in the public interest. In this regard, in order to achieve this broad public interest, delays in the processing of applications and the commencement of two-way services must also be addressed. The success of distance learning education and the success of the wireless cable system industry go hand in hand. Thus, the Commission's new rules must permit the rapid inauguration of two-way services, without application processing delays.


The National ITFS Association, Inc., and the Wireless Communications Association International, Inc., entered into a Joint Statement of Position in January of 1998 which it filed with the FCC in this proceeding. UT Television wishes to reiterate its full support of this jointly proposed solution of the conflicting interests which two-way transmissions may involve. The singular virtue of the proposal is its emphasis on flexibility. Some commenters have urged that response stations be limited to the MDS/MMDS spectrum. However, UT Television believes that it must have the ability to utilize two-way transmissions on its own ITFS channels. In time, we intend to be fully

involved in two-way transmission, using it as one of the future's most important vehicles for the distance learning and educational benefits which modern technology will afford to us. However, it seems obvious that delay in bringing these capabilities to the educational marketplace will only delay the inevitable at the expense of today's students.

In closing, we believe that the two-way licensing process proposed by the Petitioners is reasonable. The proposed process goes to great lengths to adequately address interference protection issues without the likelihood of bogging down all progress on two-way in a morass of engineering data supporting theoretical problems.

Respectfully submitted,

UT/TV-Houston

By: 
Mark Carlton

cc: Hon. William E. Kennard
Hon. Susan Ness
Hon. Harold Furchtgott-Roth
Hon. Michael K. Powell
Hon. Gloria Tristani
Mr. Roy Stewart
Mr. Keith Larson
Ms. Barbara Kreisman
Mr. CHARles Dziedzic
Mr. Michael Jacobs
Mr. David Roberts

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